

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>ROBBIE AUTERY and SHANE</b>	)	
<b>FULMER,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CIVIL ACTION NO.:</b>
<b>v.</b>	)	<b>2:08-CV-41-WC</b>
	)	
<b>KEVIN DAVIS, in his official capacity</b>	)	
<b>as Sheriff of Chilton County, Alabama,</b>	)	
<b>and individually,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT KEVIN DAVIS' FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFFS**

**COMES NOW** the Defendant, Kevin Davis, and pursuant to Rule 34 of the Federal Rules of Civil Procedure requests the Plaintiffs, separately and severally, to produce at the offices of Ball, Ball, Matthews & Novak, P.A., 2000 Interstate Park Drive, P. O. Box 2148, Montgomery, AL 36102-2148 the following documents:

1. A true and correct copy of any and all tape-recorded conversations with any of the past or current agents, servants, or employees of the Defendant.
2. A true and correct copy of any and all transcripts of tape-recorded conversations with any of the past or current agents, servants, or employees of the Defendant.
3. Copies of any and all statements previously made by the past or current agents, servants, or employees of the office of the Chilton County Sheriff concerning the subject matter of this lawsuit, including any written statements, signed or otherwise, and any stenographic, mechanical, electrical or other type of recording or transcription contemporaneously recorded.

4. Copies of all applications made by the Plaintiffs relating to applications for employment with any state, federal or governmental agency, and all schedules, exhibits or attachments made a part of any application.

5. Copies of all pay stubs received by the Plaintiffs during the last five (5) years..

6. Copies of any and all tax returns, both federal and state, prepared by or on behalf of the Plaintiffs during the last five (5) years.

7. The handwritten notes referred to during the deposition of Shane Fulmer on pages 105-107 of his deposition transcript.

8. Any and all documents relating to the Plaintiffs' pursuit of employment, jobs, or compensation by Plaintiffs to include but not limited to documents relating to efforts by Plaintiffs to obtain or engage in an occupation, business, job or source of income or compensation before, during and after the employment with Defendant, specifically including reference letters, communications with persons requested to write reference letters for Plaintiffs, resumes, draft resumes, communications with prospective employers or business associates, applications for employment or business association.

9. All medical records of the Plaintiffs, including but not limited to all histories, summaries, diagnoses, and opinion letters from January 1, 2003, to present relating to any treatment or medical advice received by Plaintiffs.

10. All drug bills and prescriptions whether received from doctors or other healthcare providers of the Plaintiffs.

11. Any and all documents relating to communications with any present or former agent, servant or employee of the Defendant.

12. All photographs, audiotapes, and videotapes relating to the claims and/or damages claimed by Plaintiffs in this lawsuit.

13. All employment records of the Plaintiffs for the last five (5) years, including all such records reflecting the absence of the Plaintiffs within such period, and all records reflecting loss of wages within such period whether due to accident, injury, sickness, or otherwise.

14. All documents which support your claim of damages.

15. Any documents relating to any of the allegations contained in Plaintiffs' Complaint.

/s/ C. Winston Sheehan, Jr.

C. WINSTON SHEEHAN (SHE 013)  
Attorneys for Defendant Kevin Davis

/s/ Allison Alford Ingram

ALLISON ALFORD INGRAM (ALF005)  
Attorneys for Defendant Kevin Davis

/s/ John W. Marsh

JOHN W. MARSH (MAR173)  
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OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2008, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered persons and that those persons not registered with the CM/ECF system were served by U.S. mail:

Hon. William E. Rutledge  
Hon. Gregory F. Yaghmai  
RUTLEDGE & YAGHMAI  
3800 Colonnade Parkway, Suite 490  
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/s/ C. Winston Sheehan, Jr.

OF COUNSEL

/s/ Allison Alford Ingram

OF COUNSEL

/s/ John W. Marsh

OF COUNSEL